

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

* STEPHEN BECKMAN, *
* Plaintiff, *
* *
* v. *
* *
* BULL HN INFORMATION SYSTEMS INC., *
* Defendant *
* *

**JOINT MOTION TO EXTEND EXPERT DISCLOSURE
AND DISCOVERY DEADLINES**

The Parties in the above action hereby submit this Joint Motion to Extend Expert Disclosure and Discovery Deadlines. Specifically, the Parties request an extension of the non-expert written and oral deposition discovery deadline up to and through March 15, 2005. The Parties also request an extension of the deadline for Plaintiff's initial expert disclosures up to and through February 1, 2005 and Defendant's initial expert disclosures up to and through April 1, 2005, with disclosures relating to rebuttal testimony to be made thereafter by May 1, 2005. This is the Parties' first request for an extension of the scheduling deadlines in this case. As further grounds for their Joint Motion to Extend, the Parties state as follows:

1. At the Scheduling Conference held on May 17, 2004, the Court accepted the deadlines proposed in the Parties' Local Rule 16.1 Joint Statement. The deadline set forth in that Joint Statement for initial disclosures relating to testifying experts is December 1, 2004 for the Plaintiff and February 1, 2005 for the Defendant, (with disclosures of rebuttal testimony to be made thereafter by March 1, 2005.)

2. The deadline for completing non-expert written and oral deposition discovery is February 1, 2005, with requests for admission allowed to be served until March 1, 2005.

3. The Parties are currently in the process of completing discovery. To date, initial disclosures have been made, Plaintiff has served Defendant with Interrogatories and Requests for Production of Documents, Defendant has served Plaintiff with Interrogatories and Requests for Production of Documents, and Plaintiff's deposition is currently scheduled for December 16, 2004. Plaintiff has responded to Defendant's written discovery and Defendant has responded to Plaintiff's written discovery. The Parties are working on a confidentiality agreement to facilitate the production of documents. Additional written discovery may also be required.

4. Due to prior commitments and the upcoming holidays, more time will be needed to complete the discovery and initial expert disclosures.

5. For all of the above reasons, the Parties request that the deadlines for disclosure of expert testimony and for completing discovery be extended. The Parties anticipate that they will be able to disclose expert witnesses and complete discovery within this time.

6. Neither Party will be prejudiced by these extensions.

WHEREFORE, the Parties respectfully request that the deadline for initial disclosures relating to Plaintiff's expert witnesses be extended from December 1, 2004 up through and including February 1, 2005, with Defendant making initial expert disclosures by April 1, 2005, (with disclosures relating to rebuttal testimony to be made thereafter in accordance with Fed.R.Civ.P.26(a)(2) by May 1, 2005, and with further discovery concerning expert witnesses completed by June 1, 2005.) The parties also request that the deadline for completing non-expert written and oral discovery be extended from February 1, 2005 up to and through March 15,

2005, with requests for admissions to be served up through and including April 15, 2005. In addition, the deadline for filing dispositive Motions shall be on or before July 1, 2005.

Respectfully submitted,
The Plaintiff,
By his attorneys,

The Defendant,
By their attorneys,

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